

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

LISA M. SWEIDAN,	x	
	:	Case No.: 1:10-cv-00719-SAS-KLL
	:	
Plaintiff,	:	Hon. S. Arthur Spiegel
	:	
v.	:	
	:	
SUN CHEMICAL CORPORATION,	:	
KIMBERLY CLARK, JOE CIONNI,	:	
GAYLE WIRTHWINE, SCOTT CHASE,	:	
JOHN ROZIER, MARTY SALYERS, AND	:	
TONY ZWIRGDZAS,	:	
	:	
Defendants.		
	x	

**REPORT OF PARTIES' PLANNING MEETING
UNDER FED. R. CIV. P. 26(f) L.R. 16.3(1)**

Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on April 14, 2011,
and was attended by:

- (i) Charles T. Lester, Jr., Esq., counsel for Plaintiff; and
- (ii) Keisha-Ann G. Gray, Esq., counsel for Defendants.

I. RECOMMENDED DISCOVERY PLAN

- (a) The parties agree to exchange their Rule 26(a) disclosures by **April 28, 2011**.
- (b) Subjects on which discovery is to be sought and the nature and extent of discovery:

Discovery shall be conducted on all of Plaintiff's claims and the defenses of Defendants. Further, the discovery need not be bifurcated.
- (b) The Parties anticipate the need for a Confidentiality Stipulation to protect from public disclosure any personal information, personnel files and proprietary information. The parties will negotiate said Stipulation and submit a Joint Proposed Confidentiality Order to the Court in compliance with Procter & Gamble Co. v. Bankers Trust Co., 78 F.3d 219 (6th Cir. 1996).
- (c) The Parties respectfully submit the following recommendations for the Court's consideration and approval:

- Recommended cut-off for amending pleadings and/or adding parties: **May 31, 2011.**
- Recommended date for Plaintiff to identify all experts and produce all expert reports: **November 1, 2011.**
- Recommended date or Defendants to identify all experts and produce all expert reports: **December 15, 2011.**
- Discovery cut-off date: **March 15, 2012.**
- Changes or limitations to discovery: **None.**
- Anticipated discovery problems: **None** except that this action may be related to an action styled *Griffin v. Sun Chemical Corp., et al, 10-cv-0744* that is currently pending before The Honorable Sandra D. Beckwith.

II. OTHER MATTERS FOR THE ATTENTION OF THE COURT

- Cut-off for Dispositive Motions: **May 15, 2012.**
- The Parties anticipate that the case will be ready for trial in or after **September 2012.**
- The Parties do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636 (c).

Respectfully Submitted,

April 28, 2011

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